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By Email and First Class Mail

September 19, 2016

Andrea Griswold, Esq.
Damian Williams, Esq.
Assistant United States Attorneys
United States Attorney's Office for the
Southern District of New York
1 St. Andrew's Plaza
New York, New York 10007

Re: *United States v. Tuzman, et al.*, 15 CR. 536 (PGG)

Dear Ms. Griswold and Mr. Williams:

On behalf of Omar Amanat, I write seeking a bill of particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure with respect to Superseding Indictment S-7. I would like to discuss these requests with you before October 7, 2016 so that we can meet and confer in good faith as required by Local Rule 16.1.

Count One

1. With respect to Paragraph 28, specify the co-conspirators identified as "others."
2. With respect to Paragraph 29, identify the victims and intended victims of the alleged wire fraud conspiracy.
3. With respect to Paragraph 12: (i) specify the "false and misleading representations"; (ii) identify how the statements were false and misleading; (iii) identify which persons or investments Mr. Amanat allegedly "solicited with false and misleading representations"; and (iv) specify the dates and locations when and where those statements were made.
4. With respect to Paragraph 12, identify whether Mr. Amanat's alleged solicitation of investments in Enable through "false and misleading representations" was an object of the alleged conspiracy charged in Count One.
5. With respect to Paragraphs 16 through 18, identify whether the alleged misrepresentations to Maiden concerning the intended and actual use of Maiden Capital's funds was an object of the alleged conspiracy charged in Count One.
6. With respect to Paragraphs 14 through 16: (i) identify the "Enable Trading Account"; (ii) specify the trades which resulted in the "Enable losses."

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Count Two

7. With respect to Paragraph 30: (i) specify the “material misrepresentations” and the “material facts” omitted concerning the status of Maiden Capital investors’ investments; (ii) specify the “material misrepresentations” and the “material facts” omitted that were allegedly caused by “the wiring of hundreds of thousands of dollars to Maiden Capital in order to pay certain redemptions and forestall Maiden Capital’s collapse”; (iii) identify the dates, locations, and communications in which the material misrepresentations and material omissions allegedly were made.

Count Four

8. With respect to Paragraph 37, specify the “others” identified as co-conspirators.
9. Does the December 2008 Agreement discussed in Paragraphs 39 and 40 constitute a separate conspiracy from the alleged agreement to commit market manipulation discussed in Paragraphs 41 through 54?

I look forward to your prompt response to these requests.

Very truly yours,



Eric M. Creizman